

1 TIFFANY & BOSCO, P.A
 2 Gregory L. Wilde, Esq.
 3 Nevada Bar No. 004417
 4 212 South Jones Boulevard
 5 Las Vegas, Nevada 89107
 6 Telephone: 702 258-8200
 7 glw@tblaw.com
 8 Fax: 702 258-8787

9 **Attorney for Secured Creditor**

10 Wells Fargo Bank, N.A.
 11 09-74059

12 UNITED STATES BANKRUPTCY COURT
 13 DISTRICT OF NEVADA

In Re:	BK Case No.: 09-19373BTB
Mark T. Reasbeck and Carrie A. Reasbeck	Chapter 13
	AMENDED NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY
	HEARING DATE: 4/5/2011 HEARING TIME: 10:30 am
	ESTIMATED TIME: 5 Minutes
Debtors.	

17 TO THE HONORABLE BRUCE T. BEESLEY, THE DEBTORS, DEBTORS' ATTORNEY OF
 18 RECORD AND THE CHAPTER 13 TRUSTEE, AND OTHER INTERESTED PARTIES:

19 PLEASE TAKE NOTICE that on the 5th day of April, 2011 at 10:30 am before United States
 20 Bankruptcy Judge, the Honorable Bruce T. Beesley, in Courtroom 4, located at the Foley Federal
 21 Building, 300 Las Vegas Boulevard South, Las Vegas, Nevada, Wells Fargo Bank, N.A., its assignees
 22 and/or successors in interest and assigns ("Movant"), will move this Court, pursuant to 11 U.S.C.
 23 §362(d), for an order terminating the automatic stay, to allow Movant to proceed with its non-
 24 bankruptcy remedies, including, but not limited to foreclosure upon obtaining possession of and selling
 25 the subject real property located at 9209 Onyx Point Ct., Henderson, NV 89074-6802 (the "subject real
 26 property").

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2 PLEASE TAKE FURTHER NOTICE that Local Bankruptcy Rule 9014(d)(1) requires that any
3 opposition to the motion must be filed and service completed upon the Movant not more than fourteen
4 (14) days after service of the motion. The opposition must set forth all relevant facts and must contain a
5 legal memorandum. An opposition may be supported by affidavits or declarations that conform to the
6 provisions of this rule.

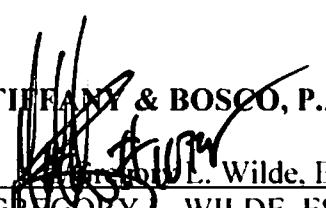
7
8 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the court.
9 You *must* also serve your written response on the person who sent you this notice.

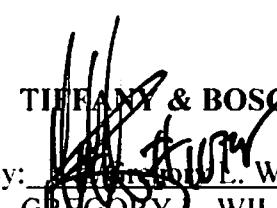
10
11 If you do not file a written response with the court, or if you do not serve your written response on the
12 person who sent you this notice, then:

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14 The court may *refuse to allow you to speak* at the scheduled hearing; and

15 The court may *rule against you* without formally calling the matter at the hearing

16
17 DATED this 3rd day of March, 2011.

18
19 
20 TIFFANY & BOSCO, P.A

21 By: 
22 GREGORY L. WILDE, ESQ.
23 Attorney for Secured Creditor
24 212 South Jones Boulevard
25 Las Vegas, Nevada 89107
26

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11 **UNITED STATES BANKRUPTCY COURT**
 12 **DISTRICT OF NEVADA**

In Re:	BK Case No.: 09-19373-BTB
Mark T. Reasbeck and Carrie A. Reasbeck	Date: 4/5/2011 Time: 10:30 am
	Chapter 13
Debtors.	

13 **CERTIFICATE OF SERVICE**

14 1. On 3/3/2011 I served the following document(s):

15 **AMENDED NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY**

16 2. I served the above-named document(s) by the following means to the persons as listed below:

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1 **X a. ECF System**

2 Randal R. Leonard
3 rleonard999@yahoo.com
4 Attorney for Debtors

5 Kathleen A Leavitt
6 courtsecf3@las13.com
7 Trustee

8 **X b. United States mail, postage fully prepaid:**

9 Randal R. Leonard
10 500 S. Seventh St.
11 Las Vegas, NV 89101
12 Attorney for Debtors

13 Mark T. Reasbeck and Carrie A. Reasbeck
14 9209 Onyx Point Court
15 Henderson, NV 89074
16 Debtors

17 Wells Fargo
18 Attn: Managing Agent
19 P O Box 31557
20 Billings, MT 59107
21 "Via Certified Mail"

22 **c. Personal Service**

23 I personally delivered the document(s) to the persons at these addresses:

24 1. For a party represented by an attorney, delivery was made by handing the
25 document(s) to the attorney's office with a clerk or other person in charge, or if no one is charge by
26 leaving the document(s) in a conspicuous place in the office.

27 2. For a party, delivery was made by handing the document(s) to the party or by
28 leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable
29 age and discretion residing there.

1 **d. By direct mail**
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3 Based upon the written assignment of the parties to accept service by email or a court order. I
4 caused the document(s) to be sent to the persons at the mail addresses listed below. I did not receive,
5 within a reasonable time after the transmission, any electronic message or other indication that the
6 transmission was unsuccessful.

7 **e. By fax transmission**
8

9 Based upon the written assignment of the parties to accept service by fax transmission or a court
10 order. I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by
11 the fax machine that I used. A copy of the record of the fax transmission is attached.

12 **f. By messenger**
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14 I served the document(s) by placing them in an envelope or package addressed to the persons at
15 the addresses listed below and providing them to a messenger for service.

16 **I declare under penalty of perjury that the foregoing is true and correct.**

17 DATED this 3rd day of March, 2011.

18 By: Jamie Miller

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